



NEW YORK CITY HOUSING AUTHORITY
LAW DEPARTMENT
90 CHURCH STREET
NEW YORK, NY 10007
<http://nyc.gov/hvcha>

GREGORY P. RUSS
Chair & CEO
LISA BOVA-HIATT
EVP of Legal Affairs and General Counsel

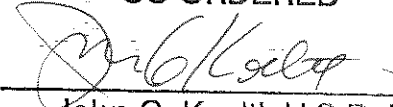
WRITER'S DIRECT LINE
(212) 776-5043

April 1, 2022

VIA CM/ECF

The Honorable John G. Koeltl, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 14A
New York, NY 10007

APPLICATION GRANTED
SO ORDERED


John G. Koeltl, U.S.D.J.

4/1/22

**Re: *Gina Williams v. New York City Housing Authority, et. al.*, Civ. No. 1:18-cv-05912
Stipulation to Extend Time to File Joint Pre-Trial Order**

Dear Judge Koeltl:

On behalf of Plaintiff and Defendant New York City Housing Authority ("NYCHA"), the only remaining defendant in the above-captioned matter, I hereby submit this joint stipulation and application for an extension of time to file a joint pre-trial order in the above-referenced matter.

On or about March 17, 2022, the law firm of Quinn Emanuel Urquhart & Sullivan LLP was retained by Plaintiff Gina Williams for the limited purpose of trying Plaintiff's case. From that day forward, counsel for Defendant NYCHA and Ms. Williams' pro bono trial counsel have been engaged in discussions concerning the scope of this case and the issues to be decided at trial while simultaneously engaged in good faith settlement negotiations.

In the interest of judicial economy, as the Parties have not yet reached an agreement as to the appropriate scope and extent of a trial in this matter, nor as to the terms of an amicable settlement, it would benefit the Parties and the Court for counsel to be given a brief extension of time in which to continue to deliberate and negotiate in advance of submitting the Parties' joint pre-trial order.

To this end, counsel for the Parties requests an extension of two (2) weeks, or until **Friday, April 15, 2022**, to submit the Parties' joint pre-trial order.

This is Defendant NYCHA's first request for an extension of the Joint Pre-Trial Order deadline, and Plaintiff's third such request (her first since retaining trial counsel).

Respectfully submitted,

/s/ Sean-Patrick Wilson

Sean-Patrick Wilson
New York City Housing Authority
Law Department, 11th Floor
90 Church Street
New York, NY 10007
Tel: (212) 776-5048
Sean-Patrick.Wilson@nycha.nyc.gov

Attorney for Defendant NYCHA

/s/ Shane Seppinni

Shane Seppinni
Quinn Emanuel Urquhart & Sullivan LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Tel: (212) 849-7035
ShaneSeppinni@quinnemanuel.com

Trial Attorneys for Plaintiff